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VALERIE P COOKE

August 8, 2003

Judge Valerie P. Cooke, Magistrate
United States District Court, District of Nevada
400 South Virginia Street
Reno, NE 89509

Re: CV-N-03-0119-HDM (VPC), Defendant Anthony DiRienzo


Dear Judge Cooke,

Pursuant to your order for me to comply with Judge McKibbon's order to respond to Mr. Robert L. Brace's Interrogatories #1-4:

Please find a copy of my reply to Mr. Brace in response to said order. Please let the record show that this obligation was met prior to the August 15, 2003 deadline you extended to me to comply.

Thank you for extending that time frame for me.

Sincerely,


Anthony DiRienzo

Robert L. Brace, Esq.
Hollister & Brace
1126 Santa Barbara Street
Santa Barbara, CA 93102

August 7, 2003

From: Anthony DiRienzo, Defendant – Dillon V. Graf, et al.

Subj: CV-N-03-0119-HDM-VPC – Interrogatories

Dear Mr. Brace:

Thank you for your timely response to my request for a copy of judge McKibbon's Court Order. I am now in receipt of the duplicate copy of the Court Order dated March 26, 2003 and acknowledge your request to answer Interrogatory Nos. 1 through 4 of said Order and have searched my files for any documentation, records and information in compliance with Judge Cooke's order relevant to the Complaint as it pertains to complaints filed against defendants in the Employers Mutual case Dillon v. Graf, et al.

To the best of my knowledge, recollection, and ability to gather information from my records, herewith is my response to the stated Interrogatories:

Interrogatory No. 1 Employers enrolled with Employers Mutual:

1- Palm Harbor Community Church

2- The Anchorage of Madeira

Interrogatory No. 2 Client address, phone# and social security number*

1 - Palm Harbor Community Church, Warren Wetherbee, Sr. Pastor (applicant)
Harvey Ignaccio, asst. Pastor (applicant)

455 Riviere Rd.
Palm Harbor, FL 34683 – Ph. 727-789-6764

*Florida HIPPA law prohibits an agent from divulge personal information to a 3rd party under the Privacy Act. Insurance agents are required to uphold this law.

2 - The Anchorage of Madeira, – Debora Kline, Mgr. (applicant)
14080 Gulf Blvd.
Madeira Beach FL 33708 – Ph. 727-393-4546

Interrogatory No. 3 Inception Dates - (Unavailable)*

Termination dates – unknown**

- 1 - Palm Harbor Community Church – Warren Wetherbee - applied on 5-10-01
- Harvey Ignaccio - applied on 5-10-01

*This is all the information available. My records do not indicate date of inception.

** No commissions were paid to me – no confirmations were given to me.

- 2 - Anchorage of Madeira - Debora Kline, Mgr. Application date ca. August, 2001

To my recollection, inception could have started around the same time. I have no records available on Ms. Kline.

* No confirmation was given from home office – information given above was retrieved from my appointment calendar and notes.

** No commissions were paid to me - no confirmations were given to me.

Regarding the above 2 cases, the applicants received their certificates of coverage and instructions for utilization, claim forms, provider listings and all confirmations and starting dates directly from Employers Mutual/ Beech Street. Acting solely in the capacity as the referring agent in both cases, I only facilitated in witnessing the application process and forwarded the applications and checks to Mr. Graff's office. The only records necessary to retain was each applicant's acknowledgement and authorization forms (copies enclosed), which I witnessed and signed. The applications to Employers Mutual were completed in each of the applicants own hand, and signed and dated by them. I witnessed their signatures and mailed those documents and premium checks directly to Mr. Graf's office. Once again, it was understood by all parties concerned that I was simply present to facilitate the application process.

The premium from Palm Harbor Community was approximately \$685.00 to cover the 1st month to cover Warren Wetherbee's household and Harvey Ignaccio.

The premium from the Anchorage of Madeira to cover Debora Kline was approximately \$175 for 1 month. These are estimates to the best of my recollection.

Interrogatory No. 4 Shared commissions?

There were no commissions paid. Mr. Gary Bastie the marketing representative introduced me to the Employers Mutual plan administered by Mr. Graf. He attended a meeting with my first referral (Palm Harbor Community Church) and actually made the presentation to Warren Wetherbee and Harvey Ignaccio. I co-presented the plan along with Mr. Bastie, more in the capacity of a trainee observing and listening to the key points of the presentation.

I was contracted under Mr. Bastie who received overrides from my personal production.

Notice: This testament is given to the best of my recollection and based on any and all records in my possession as of this day August 7, 2003.

Signed: _____



Anthony DiRinezo

Enclosures

cc. Judge Valerie P. Cooke
c/o U.S. District Court Clerk, District of Nevada

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RETIRED
WILLIAM A. BRACE
J. JAMES HOLLISTER III

July 31, 2003

Anthony DiRienzo
13478 Andova Drive
Largo, FL 33774

Re: Dillon v. Anthony DiRienzo, et al.

Dear Mr. DiRienzo:

Pursuant to your request, please find enclosed a copy of Judge McKibbon's Court Order and all related paperwork related to the Order.

Very truly yours,

HOLLISTER & BRACE

By: 

ROBERT L. BRACE

RLB/sc
Enclosures